

WWR# 040670743

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:
MICHAEL A ANZIDEO,

Debtor,

CITIZENS BANK, N.A.,

Movant.

CASE NO. 16-17752-mdc
CHAPTER 13

**Hearing Date: 10/27/2020
Hearing Time: 10:30 a.m.**

REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to F.R.C.P. 34, Movant hereby requests that the Debtor produces for inspection by the undersigned attorney for the Movant the following:

1. If you deny any or all of the subsections under Movant's Request for admission No. 1:
 - (a) Canceled check, receipt, proof of money order, or other documentation evidencing that the payment due on 5/22/2020 through 9/22/2020, was tendered to Movant.
2. Copies of any and all documents, federal and state court opinions (whether published or unpublished), federal guidelines or other applicable statutory or common law bases upon which you rely in denying Plaintiff's Request for Admission Number 1.

Respectfully Submitted,

/s/ Nathalie Paul

Nathalie Paul, PA Bar No. 309118
Weltman, Weinberg & Reis Co., L.P.A.
Attorney for Movant
170 S. Independence Mall W., Suite 874W
Philadelphia, PA 19106
267-940-1643
npaul@weltman.com